

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

March 13, 2014

VIA E-MAIL AND REGULAR MAIL

Brunswick Corporation
c/o Mr. David Selig
1 North Field Court
Lake Forrest, Illinois 60045

Albany Sport Co.
c/o Amer Sports Americas
Ray Berens, Esq.
8750 W. Bryn Mawr Avenue
Chicago, Illinois 60631

Albany Partners, LLC
c/o Slavik Enterprises
Eric Gold
32500 Telegraph Road, #222
Bingham Farms, Michigan 48025

RE: Voluntary Remediation Program Semi-Annual Status Report, January 2013
Voluntary Remediation Program Semi-Annual Status Report, July 2013
Voluntary Remediation Program Semi-Annual Status Report, January 2014
MacGregor Golf Site, HSI No. 10398,
1601 South Slappey Boulevard, Albany, Dougherty County, Georgia
Tax Parcel 0021-00001-019

Dear Messrs. Selig, Berens, and Gold:

The Georgia Environmental Protection Division (EPD) has reviewed the January 2013, July 2013, and January 2014 Progress Reports submitted for the above referenced Site pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD's comments are provided below and should be addressed in accordance with the Act:

1. EPD concurs that soil delineation on the MacGregor property is complete in accordance with Item # 5.b. of the Voluntary Remediation Program Application (VRP) checklist. If impacted material is removed from the site, confirmation samples should be collected and analytical results for all EPA TCL volatile organic compounds (VOCs) should be reported.
2. Based on inconsistencies in the direction of groundwater flow, exceedances of the cleanup standard in MW-19, MW-11 and MW-24, and the proximity of these wells to the MacGregor property line, EPD does not concur that groundwater has been completely delineated for hexavalent chromium. Monitoring wells should be completed west-northwest of MW-24 in the lower water bearing zone and south of

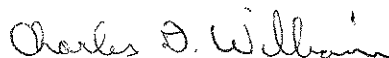
MW-19 in the upper water bearing zone to complete delineation for hexavalent chromium.

3. While no chromium has been detected in MW-8D, demonstrating vertical delineation in the area of MW-19, this well is not located in close enough proximity to MW-11 to provide vertical delineation for that area. A well extending into the lower water bearing zone in the vicinity of MW-11 should be considered to achieve vertical delineation. MW-26 and the proposed well west-northwest of MW-24 may provide vertical delineation assuming that concentrations of regulated substances are below delineation standards.
4. The sub-slab and indoor air sampling results indicate that concentrations of VOCs are in acceptable ranges and do not likely pose a risk to industrial workers at the site. It appears that a carcinogenic risk target of 1×10^{-6} was used to calculate the screening levels. While the use of a more conservative value is acceptable using 1×10^{-5} , as allowed under the Act, demonstrates very clearly that concentrations of VOCs identified are within acceptable ranges.

Brunswick Corporation, Albany Sport Company, and Albany Partners LLC (the Group) must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by the Group. However, failure of EPD to respond to a submittal within any timeframe does not relieve the Group from complying with the provisions, purposes, standards and policies of the Act.

Groundwater data demonstrating complete delineation on all impacted properties should be presented in the next progress report due July 30, 2014. If you have any questions, please contact John Maddox of the Response and Remediation Program at (404) 657-0490.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

C: Sarah Jones – Brown and Caldwell (via email)

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